

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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JENNIFER DONOVAN and  
DANIEL DONOVAN,

Plaintiffs,

v.

MIDORI PRODUCTS, LLC, KDDS  
ENTERPRISES LLC, DAVID SEMAN,  
WILLIAM DEEDS, RYAN RANDOLPH,  
RYAN COOK, ADAM JAFFE, ANTHONY  
NUZZO, EMILY HALES, and CASEY  
YOUNG,

Defendants.

Case No: 1:22-cv-774

Hon. Hala Y. Jarbou

**STIPULATION AND ORDER  
TO EXTEND DEADLINE TO  
FILE RESPONSIVE PLEADINGS**

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Defendants, Casey Young and Ryan Cook, by their attorneys, Silver & Van Essen, P.C., as well as Defendants, Midori Products, LLC, KDDS Enterprises, LLC, David Seman, William Deeds, Ryan Randolph, Adam Jaffe, Anthony Nuzzo, and Emily Hales, by their attorneys, Howard & Howard Attorneys PLLC, state as follows:

1. Plaintiff's Complaint was filed August 24, 2022.
2. Due to a miscommunication, despite not having been served with the Complaint in this matter, the Court's docket presently requires Defendants to respond to Plaintiff's complaint by September 28, 2022.
3. Defendants Casey Young and Ryan Cook are represented in this matter by the law firm of Silver & Van Essen, P.C. Young and Cook did not engage, and are not represented by, attorney Frank Mamat of the Dinsmore & Shohl law firm, nor did they authorize attorney Mamat to enter an appearance in this matter or accept service on their behalf.
4. Defendants Midori Products, LLC, KDDS Enterprises, LLC, David Seman, William Deeds, Ryan Randolph, Adam Jaffe, Anthony Nuzzo, and Emily Hales did not engage, and are not represented in this civil action by, attorney Frank Mamat of the Dinsmore & Shohl law firm, nor did they authorize attorney Mamat to enter an appearance in this matter or accept service on their behalf.
5. Recent pleadings in this matter, including the Proposed Stipulation and Order (ECF No. 5); Order (ECF No. 6); and Corrected Order (ECF No. 7); erroneously state that Defendants agreed to respond to Plaintiff's complaint by September 28, 2022.
6. Defendants did not agree to respond to Plaintiff's complaint by September 28, 2022. In fact, Defendants Young, Cook, Seman, Deeds, Randolph, Jaffe, Nuzzo, and Hales have not even been served with Plaintiff's complaint in this matter.

7. Counsel for Defendants became aware of this issue on September 19, 2022 and contacted Plaintiff's counsel that day to inform him of the foregoing.

8. In light of the foregoing and in an effort to proceed efficiently with this matter, counsel for Defendants agreed to accept service on Defendants' behalf, Plaintiff's counsel agreed to stipulate to an extension of time of forty-five (45) days for Defendants to respond to Plaintiff's complaint, and all parties agreed to continue settlement negotiations through their respective counsel in an attempt to resolve this matter.

Now, therefore, the parties, through their undersigned counsel, stipulate and agree that Defendants shall have until November 14 to respond to Plaintiff's complaint in this matter, as set forth in the Proposed Order attached hereto as **Exhibit 1**.

Dated: September 20, 2022

By: /s/ Noah S. Hurwitz

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Dated: September 20, 2022

By: /s/ Michael L. Gutierrez

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Dated: September 20, 2022

By: /s/ Mark C. Vanneste

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